

EXHIBIT 38

Russia Travel Advisory

Travel Advisory
March 5, 2022

Russia - Level 4: Do Not Travel

T U H K O

[Click Here for Important Information for U.S. Citizens Seeking to Depart Russia \(Updated Daily\).](#)

Do not travel to Russia due to the **unprovoked and unjustified attack by Russian military forces in Ukraine**, the potential for **harassment against U.S. citizens by Russian government security officials**, the **Embassy's limited ability to assist U.S. citizens in Russia**, **COVID-19** and related entry restrictions, **terrorism**, limited flights into and out of Russia, and the **arbitrary enforcement of local law**. U.S. citizens should depart Russia immediately.

U.S. citizens residing or traveling in Russia should depart immediately. Limited commercial flight options are still available. Overland routes by car and bus are also still open. **If you wish to depart Russia, you should make arrangements on your own as soon as possible**. If you plan to stay in Russia, understand the U.S. Embassy has **severe limitations on its ability to assist U.S. citizens**, and conditions, including transportation options, may **change suddenly**. U.S. citizens who are able to depart Russia for another country and are in need of emergency assistance upon arrival may contact a U.S. embassy or consulate in that country.

U.S. citizens should note that some credit and debit cards may be declined as a result of sanctions imposed on Russian banks. Also, there are some reports of cash shortages within Russia. U.S. citizens should make an alternative plan for access to money and finances if remaining in Russia.

Due to Russia's further invasion of Ukraine, an increasing number of airlines are cancelling flights into and out of Russia, and numerous countries have closed their airspace to Russian airlines. In addition, airspace around southern Russia is restricted, and a number of airports in the area have closed. U.S. citizens located in, or considering travel to, the districts of the Russian Federation immediately bordering Ukraine should be aware that the situation along the border is dangerous and unpredictable.

Given the ongoing armed conflict, U.S. citizens are strongly advised against traveling by land from Russia to Ukraine. In addition, there is the potential throughout Russia of harassment of foreigners, including through regulations targeted specifically against foreigners. Given the ongoing armed conflict and the potentially significant impact on international travel options, U.S. citizens should depart Russia immediately via the limited commercial options still available.

The U.S. government's ability to provide routine or emergency

services to U.S. citizens in Russia is severely limited, particularly in areas far from the U.S. Embassy in Moscow due to Russian government limitations on travel, the number of U.S. staff, and the ongoing suspension of operations, including consular services, at U.S. consulates.

On February 28, the Department of State authorized the voluntary departure of eligible family members and non-emergency personnel from U.S. Embassy Moscow.

Do Not Travel to:

- The North Caucasus, including Chechnya and Mount Elbrus, due to **terrorism, kidnapping, and risk of civil unrest**.
- Crimea due to Russia's occupation of the Ukrainian territory and **abuses by its occupying authorities**.

Country Summary: U.S. citizens, including former and current U.S. government and military personnel and private citizens engaged in business, who are visiting or residing in Russia have been interrogated without cause and threatened by Russian officials, and may become victims of harassment, mistreatment, and extortion. All U.S. government personnel should carefully consider their need to travel to Russia.

Russian security services have arrested U.S. citizens on spurious charges, denied them fair and transparent treatment, and have convicted them in secret trials and/or without presenting credible evidence. Russian officials may unreasonably delay U.S. consular assistance to detained U.S. citizens. Russian authorities arbitrarily enforce local laws against U.S. citizen religious workers and open questionable criminal investigations against U.S. citizens engaged in religious activity. Russian security services are increasing the arbitrary enforcement of local laws to target foreign and international organizations they consider "undesirable," and U.S. citizens should avoid travel to Russia to perform work for or volunteer with non-governmental organizations. Russian authorities may not notify the U.S. Embassy of the detention of a U.S. citizen, and consular access to detainees may be denied or severely delayed.

Russia enforces special restrictions on dual U.S.-Russian nationals and may refuse to acknowledge dual nationals' U.S. citizenship, including denying access to U.S. consular assistance and preventing their departure from Russia.

The rights to peaceful assembly and freedom of expression are not guaranteed in Russia, and U.S. citizens should avoid all political or social protests.

Terrorist groups, transnational and local terrorist organizations, and individuals inspired by extremist ideology continue plotting possible attacks in Russia. Terrorists may attack with little or no warning, targeting tourist locations, transportation hubs,

markets/shopping malls, local government facilities, hotels, clubs, restaurants, places of worship, parks, major sporting and cultural events, educational institutions, airports, and other public areas.

The Federal Aviation Administration (FAA) has issued a Notice to Air Missions (NOTAM) prohibiting U.S. aviation operations into, out of, within, or over those areas of the Moscow Flight Information Region (FIR), the Samara FIR (UWWW) and the Rostov-na-Donu (URRV) FIR within 160NM of the boundaries of the Dnipro (UKDV) Flight Information Regions. For more information, U.S. citizens should consult the [Federal Aviation Administration's Prohibitions, Restrictions, and Notices](#).

Read the Department of State's [COVID-19 page](#) before you plan any international travel.

The Centers for Disease Control and Prevention (CDC) has issued a [Level 4 Travel Health Notice for Russia](#) due to COVID-19, indicating a very high level of COVID-19 in the country.

There are restrictions in place affecting U.S. citizen entry into Russia. Your risk of contracting COVID-19 and developing severe symptoms may be lower if you are fully vaccinated with an [FDA authorized vaccine](#). Before planning any international travel, please review the CDC's specific recommendations for [fully vaccinated](#) and [unvaccinated travelers](#).

Visit the [Embassy's COVID-19 page](#) for more information on COVID-19 and related restrictions and conditions in Russia.

Read the [country information page](#).

If you decide to travel to Russia:

- Familiarize yourself with the information on [what the U.S. government can and cannot do](#) to assist you in a crisis overseas.
- Have a contingency plan in place that does not rely on U.S. government assistance. Review the [Traveler's Checklist](#).
- Monitor local and international media for breaking events and adjust your contingency plans based on the new information.
- Ensure travel documents are valid and easily accessible.
- Visit our website for [Travel to High-Risk Areas](#).
- Enroll in the [Smart Traveler Enrollment Program \(STEP\)](#) to receive Alerts and make it easier to locate you in an emergency.
- Follow the Department of State on [Facebook](#) and [Twitter](#).
- Review the [Country Security Report](#) for Russia.
- See the [U.S. Embassy's web page](#) regarding COVID-19.
- Visit the CDC's webpage on [Travel and COVID-19](#).

- VISIT THE CDC'S WEBPAGE ON [TRAVEL AND COVID-19](#).
- Get a COVID vaccine to facilitate your travel.
- Understand the COVID testing and vaccine requirements for all countries that you will transit through to your destination

North Caucasus (including Chechnya and Mount Elbrus) – Do Not Travel

Terrorist attacks and risk of civil unrest continue throughout the North Caucasus region, including in Chechnya, North Ossetia, Ingushetia, Dagestan, Stavropol, Karachayev-Cherkessiya, and Kabardino-Balkariya. Local gangs have kidnapped U.S. citizens and other foreigners for ransom. There have been credible reports of arrest, torture, and extrajudicial killing of LGBTI persons in Chechnya allegedly conducted by Chechen regional authorities.

Do not attempt to climb Mount Elbrus, as travelers must pass close to volatile and insecure areas of the North Caucasus region. The U.S. government is unable to provide emergency services to U.S. citizens traveling in the North Caucasus region, including Mount Elbrus, as U.S. government employees are prohibited from traveling to the region.

Visit our website for [Travel to High-Risk Areas](#).

Crimea – Do Not Travel

The international community, including the United States and Ukraine, does not recognize Russia's purported annexation of Crimea. There is extensive Russian Federation military presence in Crimea. Russia staged its further invasion of Ukraine from occupied Crimea, and Russia is likely to take further military actions in Crimea as part of its occupation of this part of Ukraine. There are continuing abuses against foreigners and the local population by the occupation authorities in Crimea, particularly against those who are seen as challenging their authority on the peninsula.

The U.S. government is unable to provide emergency services to U.S. citizens traveling in Crimea, as U.S. government employees are prohibited from traveling to Crimea.

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Last Update: Reissued with updates on security situation and advice to U.S. citizens.